

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EIG ENERGY FUND XIV, L.P.,	:	
EIG ENERGY FUND XIV-A, L.P.,	:	
EIG ENERGY FUND XIV-B, L.P.,	:	
EIG ENERGY FUND XIV (CAYMAN), L.P.,	:	
EIG ENERGY FUND XV, L.P.,	:	
EIG ENERGY FUND XV-A, L.P.,	:	
EIG ENERGY FUND XV-B, L.P., and	:	Case No. 18-cv-01047-PGG
EIG ENERGY FUND XV (CAYMAN), L.P.,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
KEPPEL OFFSHORE & MARINE LTD.,	:	
	:	
Defendant.	:	
_____	X	

Appendix to Plaintiffs' Local Rule 56.1 Statement of Undisputed Facts

Table of Contents

**Translation included*

Exhibit	Date (YYYY.MM.DD)	Beginning Bates No.	Description
1 *	2010.01.00	EIG_KEP_00166276; EIG00091793	Confidential Information Memorandum: Pre-Salt Drilling Rigs Project
2 *	2010.09.27	EIG_KEP_00075177; EIG00025561	Email with subject line: "Petrobras & drilling rigs [C1]," and relevant attachment "The Drilling Rigs Project: Petrobras' Strategy for its successful implantation"
3	2010.10.25	EIG_KEP_00075164	Email with subject line: "Project Pre-Salt Oil Rigs," and relevant attachment "Pre- Salt Oil Rigs Project"
4	2010.12.06	KEPPEL00619705	Email chain with subject line: "FW: Confidential"
5 *	2010.12.30	EIG_KEP_00050771; EIG00025390	Email chain with subject line: "FW: Sete Brasil – NDA"
6 *	2011.01.06	EIG_KEP_00164882; EIG00091664	Caixa Investment Memorandum FIP Sondas
7	2011.01.10	KEPPEL00036103	Email chain with subject line: "Re: Updates on Brazil"

Exhibit	Date (YYYY.MM.DD)	Beginning Bates No.	Description
8*	2011.01.14	KEPPEL00049887	Email chain with subject line: “Fw: Petrobras/Finance Presentation on January 12, 2011,” and relevant attachment “Drilling Rigs in Brazil Project: Presentation to Drilling Operators”
9	2011.02.12	KEPPEL00007701	Email chain with subject line: “FW: Press Release – Contracting of the construction and chartering of drilling rigs with EAS and Sete Brasil S.A.”
10	2011.03.03	EIG_KEP_00075067	Email chain with subject line: “Sete Brasil”
11	2011.04.09	KEPPEL00010390	Email with subject line: “FW: Barusco”
12	2011.04.18	KEPPEL00037968	Article with title: “First phase backers eye preferential rights for next round”
13	2011.06.02	EIG_KEP_00073982	Email with subject line: “Sete Brasil follow up requests”
14*	2011.06.03	EIG_KEP_00073975	Email chain with subject line: “RE: Thank you very much”
15*	2011.06.15	KEPPEL00441474	Email with subject line: “SETEBR Proposal,” and relevant attachment “Keppel Fels Request for Proposals Letter”
16	2011.06.23	EIG_KEP_00203445	Email chain with subject line: “RE: Sete compliance”
17	2011.06.27	EIG_KEP_00070012	Energy Fund XIV Investment Recommendation
18	2011.06.27	EIG_KEP_00127316	Minutes of TCW Energy Fund XIV EIG Investment Committee Meeting
19	2011.06.30	EIG_KEP_00049151	Investment Agreement Second Round of Private Placements for the Sondas Project
20	2011.07.12	EIG_KEP_00076503	Project Sondas Working Group: Confidential July 2011
21	2011.07.15	KEPPEL00269513	Email chain with subject line: “Re: Speculation Semi,” and relevant attachments
22	2011.07.15	KEPPEL00619599	Keppel Fels Limited Proposal Letter to Sete Brasil
23	2011.07.30	KEPPEL00010310	Email chain with subject line: “Re: Enc: Sete visit Brasfels”
24*	2011.08.03	KEPPEL00010458	Email chain with subject line: “FW: Brasfels Visit”

Exhibit	Date (YYYY.MM.DD)	Beginning Bates No.	Description
25*	2011.08.11	KEPPEL00011126	Email chain with subject line: "Comments from Fábio Cunha of SETE BRASIL company"
26*	2011.08.16	KEPPEL00020438	Email with subject line: "Pipeline sector has deadline to meet ANP [Brazilian National Agency of Petroleum, Natural Gas, and Biofuels] Regulations"
27	2011.08.15	KEPPEL00030275	Email chain with subject line: "RE: Film Sete"
28	2011.08.20	KEPPEL00020435	Email chain with subject line: "Re: Videotape Brasfels shipyard on 8/24"
29	2011.08.22	KEPPEL00440969	Keppel Corp. Ltd. Extract of Minutes of Directors' Meeting held on July 21, 2011
30*	2011.08.23	EIG_KEP_00048952	Email chain with subject line: "Enc: [Sete Brasil] PPT Blair Thomas," and relevant attachment "Lakeshore SeteBrasil Management Presentation"
31	2011.09.08	EIG_KEP_00048626	First Amendment and Restatement Agreement
32	2011.09.14	EIG_KEP_00251571	Email chain with subject line: "FW: [Sete Brasil] Information Memorandum," and relevant attachment "Sete Brasil Participações Private Placement: Confidential Information Memorandum"
33	2011.09.16	EIG_KEP_00069924	EIG Energy Fund XV Investment Recommendation
34	2011.09.16	EIG_KEP_00127312	Minutes of Energy Fund XV EIG Investment Committee Meeting
35	2011.09.19	KEPPEL00045696	Email with subject line: "Message"
36	2011.09.19	KEPPEL00280920	Instant messaging transcript of conversation between Nora Marsuki and Jeffery Chow
37	2011.09.27	KEPPEL00040804	Email with subject line: "RE: Ship Offshore Forum Rio 16-17 September," and relevant attachment "The Drilling Rigs Project: Petrobras' Strategy for its successful implementation"
38	2011.09.27	KEPPEL00459977	Brasfels Proposal letter for Newbuild DSS38E-DP3 Semisubmersible Rigs

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39	2011.10.30	KEPPEL00556336	Email chain with subject line: “Fw: Sete Brasil: LOI,” and relevant attachment “Sete Brasil Management Presentation”
40	2011.11.17	KEPPEL00267958	Keppel Corporation Human Resources Policies & Procedures Code of Conduct
41	2011.11.29	KEPPEL00427320	Email chain with subject line: “For IMPAC approval: KOM – Proposed JV with Sete Brasil for Newbuild DSS38E Semisubmersible Rig,” and relevant attachments
42	2011.12.10	KEPPEL00008389	Email with subject line: “Cancellation of JV”
43	2011.12.15	KEPPEL00435116	Email with subject line: “RE: Petrobras Bid – Option Rigs,” and relevant attachment “Marketing Consulting and Services Agreement”
44	2011.12.16	KEPPEL00490690	EPC Contract between Urca Drilling B.V. and Fernvale
45	2012.02.09	KEPPEL00080277	Email chain with subject line: “RE: Presentation material for today”
46	2012.02.13	KEPPEL0042287	“Email with subject line: “O&M Press Clippings – 130212,” and relevant attachments
47	2012.03.08	KEPPEL00460745	Email chain with subject line: “Fwd: Sete Brazil”
48	2012.03.09	KEPPEL00278825	Email with subject line: “Daily News Report – 09 March 2012,” and relevant attachment “Daily News”
49*	2012.03.16	KEPPEL00020565	Email chain with subject line: “RE: BrasFels investor visit”
50*	2012.03.20	KEPPEL00012940	Email chain with subject line: “Fw: RE: investors’ visit to BrasFels”
51	2012.03.30	KEPPEL00046214	Email chain with subject line: “Re: Sete Contract”
52	2012.04.03	KEPPEL00490240	Email chain with subject line: “Fw: Sete”
53	2012.03.22	KEPPEL00572590	LOI between Sete and Keppel Brasil
54	2012.04.09	KEPPEL00046490	Email chain with subject line: “Re: Agreements”
55*	2012.04.20	KEPPEL00280913	Email chain with subject line: “Re: Deep Sea Oil Corp”

Exhibit	Date (YYYY.MM.DD)	Beginning Bates No.	Description
56	2012.05.08	KEPPEL00546088	Email chain with subject line: “FW: Deep Sea Oil Corp,” and relevant attachments
57	2012.05.15	KEPPEL00546194	Email chain with subject line: “Fernvale / Eagle and Deep Sea Oil Agreements,” and relevant attachments
58*	2012.05.18	KEPPEL00074639	Email chain with subject line: “Re: RE: RE: BrasFels Inspection”
59	2012.07.19	KEPPEL00281196	Email chain with subject line: “Re: General”
60	2012.07.24	KEPPEL00541292	Email chain with subject line: “RE: Commission Agreements between Fernvale and Eagle”
61*	2012.07.31	EIG_KEP_00110494	Rigs Project Second Amendment to the Investment Agreement
62*	2012.07.31	EIG_KEP_00044772	FIP Sondas Investment Commitment
63*	2012.07.31	EIG_KEP 00211771	FIP Sondas’ Quotaholders Agreement
64	2012.08.07		Keppel Offshore & Marine Media Release: “Keppel signs contracts with Sete Brasil for five DSS 38E semis for US \$4.1 billion”
65	2012.08.07	KEPPEL00000214	Marketing Consulting and Services Agreement between Fernvale Deep Sea Oil
66	2012.08.07	KEPPEL00045252	Agency Agreement between Fernvale and Eagle
67	2012.08.07	KEPPEL00555190	Email chain with subject line: “RE: Zwi”
68	2012.10.09	KEPPEL00441071	Email with subject line: “RE: Information requested on SETE Contract,” and relevant attachment “KOM SRP (2012 – Q3)”
69	2013.01.17	KEPPEL00011057	Email with subject line: “Re: Yard visitors”
70	2013.02.22	KEPPEL00007815	Email chain with subject line: “Re: Brasfels visit with UKEF”
71	2013.06.06	KEPPEL00457152	Email chain with subject line: “RE: VISIT TO BRASFELS – INVESTORS,” and relevant attachment “Visita ao Estaleiro Keppel – dia 06/06/2013”
72*	2013.06.07	KEPPEL00589219	Email chain with subject line: “Re: ‘All Lenders Meeting’”
73	2013.06.12	KEPPEL00008303	Email chain with subject line: “RE: Sete semi man-hour”

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74	2013.09.21	EIG_KEP_00249871	2013 EIG Partners' Conference agenda
75*	2013.09.25	EIG_KEP_00249870	EIG Conference Roundtable transcript
76*	2013.10.03	KEPPEL00023181	Email chain with subject line: "Invoice Reais URCA," and relevant attachment "INVOICE 070 EAGLE DO BRASIL"
77	2013.12.31		Keppel Corp. 2013 Annual Report (excerpts)
78	2014.06.24	EIG_KEP_00142563	Email chain with subject line: "Sete Brasil"
79*	2014.11.21	EIG_KEP_00148015; EIG00064923	Sete Letter to the Board of Directors re: "Audit of Contracts"
80*	2014.12.16	EIG_KEP_00208069	Executive Board Decision No. 1239/2014-BNDES Meeting of December 16, 2014
81	2014.12.16	EIG_KEP_00209430	PowerPoint Presentation titled: "Sete Brasil: December 2014 – Quarterly Review"
82	2014.12.30	KEPPEL00495287	Email chain with subject line: "RE: Brazil update 2"
83	2015.01.09	KEPPEL00634953	Email with subject line: "FW: Urca and Frade Anticorruption letters," and relevant attachments
84	2015.01.10	KEPPEL00485414	Email chain with subject line: "Re: Sete / BNDS"
85	2015.01.23	KEPPEL00635162	Email with subject line: "Fwd: Enc.: Sete Brasil Anticorruption Letters," and relevant attachments
86	2015.01.31	KEPPEL00089793	Email with subject line: "SETE update"
87	2015.02.02	KEPPEL00641136	Email chain with subject line: "RE: SETE update: Anti-Corruption Declarations"
88*	2015.02.05	EIG_KEP_00235093	Email chain with subject line: "Re: Sete Brasil – Communication to Shareholders"
89	2015.02.06	KEPPEL00440536	Email chain with subject line: "Re: Barusco statement"
90	2015.02.07	KEPPEL00440618	Email chain with subject line: "Re: Barusco statement"
91	2015.02.09	EIG_KEP_00284095	Email chain with subject line: "SETE – news," and relevant attachment "Briefing Memo regarding SETE"

Exhibit	Date (YYYY.MM.DD)	Beginning Bates No.	Description
92	2015.02.09	KEPPEL00641231	Email chain with subject line: “FW: Lava Jato – Letters to Clients of KO&M Business Units,” and relevant attachment “KFELS Ltr. to Clients Refuting Allegations 9 Feb 2015 v3.docx”
93	2015.02.10	KEPPEL00553544	Keppel Corp. Response to Media Reports on Ongoing Investigations on Petrobras
94	2015.02.12	KEPPEL00439868	Email chain with subject line: “RE: Sete”
95	2015.03.09	KEPPEL00485355	Email with subject line: “RE: Brazil News Report – 3 March 2015”
96*	2015.04.13	EIG_KEP_00237889	Letter with subject line: “Protection Mechanism with Liquidity for Management”
97*	2015.04.30	EIG_KEP_00203226; EIG00155998	Sete Brasil April 2015 Executive Report
98	2015.05.15		Petrobras Form 20-F Annual Report (excerpts)
99*	2015.05.19	EIG_KEP_00237593; EIG00110474	Sete Announcement of Special Meeting of Shareholders
100*	2015.08.10		Brazilian Prosecutor’s Pleading in Case No. 5040086-03.2015.4.04.7000 (translated)
101	2016.08.03		Keppel Corp. Response to Media Reports
102	2016.12.31	KEPPEL00000153	Keppel Offshore & Marine Organization Chart 2009-2016
103	2017.08.29		Jeffery Chow Information
104	2017.08.29		<i>United States v. Chow</i> Plea Transcript
105	2017.12.22		Keppel DPA with Attachments
106	2018.09.26		Petrobras NPA with Attachments
107	2018.09.27		SEC Press Release “Petrobras Reaches Settlement with SEC for Misleading Investors”
108*	2018.12.06	EIG_KEP_00176682; EIG00228070	Letter to Sete Brasil Shareholders: “Proposed Acquisition of All Issued Shares of Sete Brasil”
109*	2019.02.26	EIG_KEP_00175809; EIG00228048	Caixa Memo to Members of the FIP Sondas Investment Committee: “Supporting Documentation: 156 th Meeting of the Investment Committee”

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110	2019.06.25		Skornicki Plea Transcript
111*	2019.11.01	EIG_KEP_00249897; EIG00228789	Minutes of the 156 th Meeting of the Investment Committee
112*	2020.01.27	EIG_KEP_00249872 EIG00228764	Caixa Memo: “Fundo De Investimento Em Participacoes – Sondas- Multiestrategia”
113	2021.06.04		Defendant’s R&Os to Plaintiffs’ RFAs
114	2021.07.30		Defendant’s First Amended Responses and Objections to Plaintiffs’ First Set of Interrogatories
115	Undated	EIG_KEP_00166208	Index of Documents Placed in the Data Room
116	Undated	EIG_KEP_00166643	Draft Engineering, Procurement and Construction Contract Agreement between SPC and Contractor Drilling Rig Unit
117	Undated	EIG_KEP_00051566	EIG Sete Funding Instructions
118	2021.08.05		Excerpts of Albe Deposition Transcript (Alvin Albe)
119	2021.07.22		Excerpts of Anderson Deposition Transcript (Jeffrey Anderson)
120	2021.06.30		Excerpts of Chong Deposition Transcript (Kenneth Chong)
121	2021.06.24		Excerpts of Chow Deposition Transcript (Jeffery Chow)
122	2021.07.20		Excerpts of Corrigan Deposition Transcript (Kevin Corrigan) with Errata Sheet
123	2020.10.16		Excerpts of Corrigan Deposition Transcript (Kevin Corrigan) [D.C. Action]
124	2021.05.27		Excerpts of Hayden Deposition Transcript (Simon Hayden) with Errata Sheet
125	2020.10.29		Excerpts of Hayden Deposition Transcript (Simon Hayden) with Errata Sheet [D.C. Action]
126	2021.07.09		Excerpts of Loh Deposition Transcript (Chin Hua Loh)
127	2021.06.04		Excerpts of Lowder Deposition Transcript (Kevin Lowder) with Errata Sheet

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128	2020.12.10		Excerpts of Lowder Deposition Transcript (Kevin Lowder) with Errata Sheet [D.C. Action]
129	2021.01.27		Excerpts of Magela Deposition Transcript (Jose Magela Bernardes) [D.C. Action]
130	2021.07.02		Excerpts of Merchant Deposition Transcript (Aziz Merchant)
131	2021.06.17		Excerpts of Talbot Deposition Transcript (Kurt Talbot)
132	2020.11.11		Excerpts of Talbot Deposition Transcript (Kurt Talbot) with Errata Sheet [D.C. Action]
133	2021.07.15 2021.07.16		Excerpts of Tan Deposition Transcript (LP Tan)
134	2021.07.31		Excerpts of Thomas Deposition Transcript (Robert Blair Thomas III)
135	2020.12.16		Excerpts of Thomas Deposition Transcript (Robert Blair Thomas III) [D.C. Action]
136	2021.06.11		Excerpts of Wade Deposition Transcript (Randall Wade) with Errata Sheet